

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION – BOSTON)**

KIRA WAHLSTROM,)	
)	
)	
Plaintiff,)	
)	
v.)	No. 1:22-cv-10792-RGS
)	
DAVID J. HOEY, LAW OFFICES OF)	
DAVID J. HOEY, P.C., DON C. KEENAN,)	
D.C. KEENAN & ASSOCIATES, P.C.)	
D/B/A THE KEENAN LAW FIRM, P.C.,)	
AND KEENAN’S KIDS FOUNDATION,)	
INC.,)	
)	
Defendants.)	

**TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA’S
MOTION TO INTERVENE**

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 24, Travelers Casualty and Surety Company of America (“Travelers”) respectfully requests the Court permit its intervention in this action for the sole and limited purpose of submitting specialized verdict form/special interrogatories at trial. Travelers moves for intervention under FRCP 24(a) or alternatively under FRCP 24(b). In support of this motion, Travelers submits its contemporaneously filed Memorandum in Support of Motion to Intervene and incorporated exhibit.

Dated: December 11, 2023

TRAVELERS CASUALTY AND SURETY
COMPANY OF AMERICA

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*Attorneys for Travelers Casualty and Surety Insurance
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LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Logan A. Carducci, counsel for Travelers Casualty and Surety Company of America, in the above captioned matter, hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court of Massachusetts, I conferred with counsel for the Plaintiff and counsel for the Defendants. Counsel for the Plaintiff and Counsel for Defendants David J. Hoey and Law Offices of David J. Hoey, P.C. consent to this Motion to Intervene. Counsel for the remaining Defendants¹, Don C. Keenan and D.C. Keenan & Associates, P.C. d/b/a The Keenan Law Firm, P.C. does not consent to this Motion to Intervene.

Dated: December 11, 2023

/s/Logan A. Carducci
Logan A. Carducci

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of December, 2023, Travelers Casualty and Surety Company of America's Motion to Intervene was served, via electronic delivery to all counsel via CM/ECF system which will forward copies to Counsel of Record.

/s/Logan A. Carducci
Logan A. Carducci

¹ Defendant Keenan's Kids Foundation, Inc. was dismissed from this action.